# REMARKS

## Status of Claims

Claims 1 to 29 remain in the application.

## Claim Amendments

Independent claims 1 and 16 have been amended in response to the Examiner's rejections under 35 U.S.C. 101 and for the sake of clarity.

## Claim Rejections – 35 U.S.C. 101

In response to the Examiner's rejection of independent claims 1 and 16 under 35 U.S.C. 101, claims 1 and 16 have been amended to clarify that the method (claim 1) is carried out in a wireless receiver having an air interface that receives the MxN symbols and that the apparatus (claim 16) includes a wireless receiver configured to receive the MxN symbols wirelessly. In view of the foregoing amendments, Applicant respectfully submits that the method claim is clearly tied to an apparatus (wireless receiver) that performs the method and the apparatus claim includes at least one structural element in the body of the claim.

The Examiner is respectfully requested to reconsider and withdraw the rejection of claims 1 and 16 under 35 U.S.C. 101.

## Claim Rejections – 35 U.S.C. 103

In paragraphs 3 and 4 of the Office Action, the Examiner rejects claims 1, 2, 4, 5, 8, 9, 13, 14, 16, 17, 19, 20 and 23-28 under 35 U.S.C. 103(a) based on combinations of several references, as discussed below in detail.

Applicant respectfully traverses these rejections for reasons stated below.

The law on obviousness under 35 U.S.C. 103 was recently addressed in ***KSR Int'l v. Teleflex, Inc.***, *No. 04-1350, slip op. at 14 (U.S., Apr. 30, 2007)*. Following this, examination guidelines were released on October 10, 2007 in regards to determining obviousness under 35 U.S.C. 103.

According to these guidelines, the framework for the objective analysis for determining obviousness under 35 U.S.C. 103 is stated in ***Graham v. John Deere Co****. 383 U.S. 1,148 USPQ 459 (1966)*. Obviousness is a question of law based on underlying factual inquiries. The factual inquiries enunciated by the Court are as follows:

(1) Determining the scope and content of the prior art;

(2) Ascertaining the differences between the claimed invention and the prior art; and

(3) Resolving the level of ordinary skill in the pertinent art.

The Graham factors, including secondary considerations when present, are the controlling inquiries in any obviousness analysis. Once the findings of fact are articulated, Office personnel must provide an explanation to support an obviousness rejection under 35 U.S.C. 103. According to the Supreme Court ruling in ***KSR***, for the Patent Office to properly combine references in support of an obviousness rejection, the Patent Office must identify a reason why a person of ordinary skill in the art would have sought to combine the respective teachings of the applied references.

In rejecting claims under 35 U.S.C. § 103(a), the Examiner bears the initial burden of establishing a prima facie case of obviousness. *In re Oetiker*, 977 F.2d 1443, 1445 (Fed. Cir. 1992). *See also In re Piasecki*, 745 F.2d 1468, 1472 (Fed. Cir. 1984). It is incumbent upon the Examiner to establish a factual basis to support the legal conclusion of obviousness. *See In re Fine*, 837 F.2d, 1071, 1073 (Fed. Cir. 1988). In so doing, the examiner is expected to make the factual determinations set forth in *Graham v. John Deere Co.*, 383 U.S. 1, 17 (1966), *viz.*, (1) the scope and content of the prior art; (2) the differences between the prior art and the claims at issue; and (3) the level of ordinary skill in the art. Additionally, in making a rejection under 35 U.S.C. § 103(a) on the basis of obviousness, the Examiner must provide some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness. *KSR Int'l. Co. v. Teleflex Inc.*,127 S.Ct. 1727, 1741 (2007). Only if this initial burden is met does the burden of coming forward with evidence or argument shift to the appellant. *See Oetiker*, 977 F.2d at 1445. *See also Piasecki*, 745 F.2d at 1472. Obviousness is then determined on the basis

of the evidence as a whole and the relative persuasiveness of the arguments. *See Oetiker*, 977 F.2d at 1445; *Piasecki*, 745 F.2d at 1472.

Applicant's analysis below demonstrates that the claims should be found novel and unobvious, as an analysis following the factual inquiries laid out in Graham v. John Deere Co. clearly reveals that the findings of fact articulated by the Examiner are improper and cannot be found to support an obviousness rejection of the claimed invention.

Independent Claim 1

In paragraph 3 of the Office Action, the Examiner maintains the rejection of claims 1, 9, 13, 14, 16, 24, 27 and 28 under 35 U.S.C. 103(a) as being unpatentable over United States Patent No. 5,550,809 ("Bottomley") in view of United States Patent No. 5,204,874 ('Falconer"). In response, Applicant respectfully submits that the currently amended claims are both novel and inventive over Bottomley and Falconer, both alone and in combination, for at least the reasons stated below.

*Determining The Scope Of The Prior Art*

**Bottomley**

Bottomley is directed to a system and method for CDMA (code division multiple access) communications, in which, prior to transmission, information symbols are spread at the transmitter using orthogonal or bi-orthogonal codewords and are then scrambled with an assigned scramble mask that is taken from a set of scramble masks having selected correlation properties (See the Abstract and Column 5, lines 38-67). The set of scramble masks is selected such that the correlation between the modulo-2 sum of two scramble masks with any codeword is a constant magnitude, independent of the codeword and the individual masks being compared.

It is important to note that all of the "spreading" of the information symbols is done by the orthogonal or bi-orthogonal codewords, as the scramble masks are the same length as the codewords, and hence do not produce any additional "spreading" (See Column 6, lines 14-21). In some cases the "spreading" and "scrambling" steps may be combined into a single step by pre-combining the spreading codeword and the scramble mask to form an effective spreading or

signature sequence (See Column 6, lines 6-13).

By scrambling an original set of spreading codewords by each scrambling mask of a set of scrambling masks, several sets of effective spreading sequences or signature sequences can be generated from the original set of spreading codewords (See Column 6, lines 22-34).

Each unique "effective spreading sequence" represents a "channel" in the CDMA system. At a receiver, a composite signal may be received that includes a plurality of such "channels", i.e., spread and scrambled information symbols from multiple user. As such, at the receiver the composite received signal (after demodulation) is correlated to the conjugate(s) of the potential effective spreading sequence(s), according to the spreading form used and the number of channels to be detected. This process, called descrambling and despreading the demodulated signal, is realized by correlating directly to the assigned effective spreading sequence, which as described above is the combination of a scramble mask and a spreading sequence/codeword. Alternatively, the descrambling and despreading can be performed separately: (1) descrambling by correlating to the appropriate scramble mask(s), and (2) despreading <u>by correlating to the appropriate orthogonal or bi-orthogonal spreading sequence(s)</u> (See Column 8, lines 3-15).

It should be noted that Bottomley describes two scenarios:

a) correlating with the effective spreading sequence (pre-combination of scramble mask and spreading sequence); or

b) descrambling by correlating to the appropriate scramble mask(s), which are clearly not a spreading code, and then despreading by correlating to the spreading sequence.

On page 5 of the Office Action, the Examiner asserts that Bottomley discloses a method of <u>decoding</u> MxN symbols in which a first codeword of length N of a first set of K codewords has been spread by a second codeword of length M of a second set of L codewords, the first codeword identifying a first information and the second codeword identifying a second information, the method comprising:

for each set of M consecutive symbols, <u>performing a first parallel code multiplying operation by</u>

multiplying the M symbols by each of the L codewords of the second set of codewords, thereby producing L first output symbols, each of the L first output symbols being associated with one of the L codewords;

for each of at least one codeword of said set of L codewords:

for a set of N consecutive first output symbols associated with the codeword, performing a respective second parallel code multiplying operation by multiplying the set of N consecutive first output symbols by each of the K codewords of the first set of codewords to produce a set of K second output symbols, each second output symbol being associated with one of the K codewords and with said codeword of the set of said L codewords.

That is, the Examiner asserts that Bottomley teaches a method of decoding that includes two multiplying operations, a first multiplication by a set of spreading codes (multiplying the M symbols by each of the L codewords of the second set of codewords) and a second multiplication by each of the first set of codewords (multiplying the set of N consecutive first output symbols by each of the K codewords of the first set of codewords). However, Bottomley fails to teach two such multiplications. Note that in both scenarios a) and b) of Bottomley discussed above, the correlation to the spreading sequence (effective spreading sequence in scenario a); orthogonal/bi-orthogonal spreading sequence in scenario b) ) is the final step of the method. That is, Bottomley does not describe multiplying M consecutive symbols by each of L potential spreading sequences/codewords to generate L first output symbols and then for each of at least one spreading sequence/codeword of said set of L potential spreading sequences/codewords, multiplying N consecutive first output symbols associated with the codeword, multiplying the set of N consecutive first output symbols by each of the K potential information symbols (K potential first codewords that may have been spread by the spreading sequence/codeword associated with the first output symbol) to produce a set of K second output symbols.

Furthermore, Applicant notes that the portions of Bottomley that the Examiner has pointed to in support of the assertion that Bottomley discloses a method of decoding MxN symbols that includes the separate multiplication steps discussed above have absolutely nothing to do with decoding. In support of the foregoing assertion, the Examiner pointed to column 1, lines 25-34

of Bottomley, which state: "at a transmitter, a binary information symbol b (+/-1) can be spread by multiplying b with a spreading sequence x; for example, the spreading sequence x might be +1, -1, +1, -1, consisting of four binary chips"(emphasis added). However, clearly, spreading a binary information symbol at a transmitter is related to encoding a symbol and has absolutely nothing to do with decoding MxN symbols.

In view of the foregoing, Applicant respectfully submits that the Examiner has failed to accurately determine the scope of Bottomley.

**Falconer**

Falconer is directed to a method and apparatus for encoding and decoding. In encoding, bits are encoded into symbols such that maximum likelihood decoding is facilitated. Groups of symbols are translated by either interleaving by group each group within a block and subsequently deriving an orthogonal code from each group or deriving an orthogonal code from each group and subsequently interleaving by code each code within a block. In decoding, groups of samples are transformed by either generating metrics and index symbols for each group of samples and subsequently deinterleaving by group each group of metrics within a block or deinterleaving by group each group of samples within a block and subsequently generating metrics and index symbols for each deinterleaved group of samples. Each metric represents the confidence that a group of samples is a particular orthogonal code. Subsequently, maximum likelihood decoding generates an estimated bit from the index symbols and metrics (See Abstract).

On page 6 of the Office Action, the Examiner appears to assert that Falconer teaches "determining an overall maximum second output symbol output of the second output symbols output of said second parallel code multiplying operations". In support of this assertion, the Examiner states that "Falconer et al. do suggest a predetermined size based on a maximum number of data symbols which can be transmitted at a certain rate" and points to column 6, lines 10-14 of Falconer, which state that "the predetermined size of the block of data symbols defined by the matrix is derived from the maximum number of data symbols which can be transmitted at a predetermined chip rate within a predetermined length transmission block". However, neither the first statement by the Examiner, nor the portion of Falconer that the Examiner has pointed to

appear to have anything to do with "determining an overall maximum second output symbol output of the second output symbols output of said second parallel code multiplying operations".

In contrast, the Examiner's comment and the quoted portion of Falconer relate to the fact that Falconer describes the interleaving of encoded data symbols by loading the encoded data symbols into a matrix on a column-by-column basis, while removing the encoded data symbols from the matrix on a row-by-row basis so that the encoded data symbols corresponding to one unencoded data bit are interleaved with the encoded data symbols of other unencoded data bits, and, since the matrix is designed to hold all of the encoded data symbols for one transmission block, the dimensions of the matrix, i.e., the number of data symbols transmitted during one transmission block, is determined by the chip rate of the transmitter (which is determined by the symbol rate of the encoder) and the length of the transmission block. (See Column 6, lines 15-24).

It does not seem that the foregoing features of Falconer are in any way related to "determining an overall maximum second output symbol output of the second output symbols output of said second parallel code multiplying operations", as the foregoing features of Falconer has absolutely nothing to do with determining which of a plurality of outputs generated by a parallel multiplication operation is the largest output.

In view of the foregoing, Applicant respectfully submits that the Examiner has failed to accurately determine the scope of Falconer.

*Ascertaining The Differences Between The Claimed Invention And The Prior Art*

Claim 1 recites "for each set of M consecutive symbols, performing a first parallel code multiplying operation by multiplying the M symbols by each of the L codewords of the second set of codewords, thereby producing L first output symbols, each of the L first output symbols being associated with one of the L codewords" and "for a set of N consecutive first output symbols associated with the codeword, performing a respective second parallel code multiplying operation by multiplying the set of N consecutive first output symbols by each of the K codewords of the first set of codewords to produce a set of K second output symbols, each

second output symbol being associated with one of the K codewords and with said codeword of the set of said L codewords" (emphasis added). Therefore, claim 1 defines a second parallel code multiplying operation that multiplies N consecutive output symbols from a first parallel code multiplying operation by each of the codewords of the first set of code words in parallel. (emphasis added). The Examiner contends that Bottomley teaches this subject matter in column 1, lines 25-34. However, as noted above, this portion of Bottomley teaches "at a transmitter, a binary information symbol b (±1) can be spread by multiplying b with a spreading sequence x; for example, the spreading sequence x might be +1, -1, +1, -1, consisting of four binary chips". Applicant previously pointed out that by describing the spreading of only one binary information symbol, Bottomley is completely silent as to a first parallel code multiplying operation and a second parallel code multiplying operation as claimed by the Applicant. In particular, there is no hint or suggestion of any parallelism in the spreading of the binary information symbol. Furthermore, as noted above, the portion of Bottomley that the Examiner has pointed to relates to encoding at a transmitter, and therefore clearly teaches nothing about the use of parallel multiplication as part of a decoding method.

In the current Office Action, the Examiner's response to Applicant's previous argument on this point states that "[the foregoing portion of Bottomley] suggests that each binary information symbol is spread by multiplying by a spreading sequence (i.e. set of chips "+1,-1,+1,-1") meaning there is more than one multiplication being performed simultaneously (i.e., parallel); at the very least, it is reasonable to expect one of ordinary skill in the art at the time of the applicants' invention to utilize parallel processing as is commonly known in the are for a much faster and efficient performance gain". However, Applicant submits that this statement by the Examiner is entirely inaccurate, as the multiplication of the binary information symbol "b" by the spreading sequence "x" taught by Bottomley represents a single multiplication, i.e., multiplication of a single symbol by a single sequence. Spreading in conventional Code Division Multiple Access (CDMA) systems, which is what Bottomley refers to in the passage cited by the Examiner, does not include a first parallel code multiplying operation, as in the claimed invention, i.e multiplying M consecutive symbols by each of the L codewords of a second set of codewords in parallel. As such, the assertion by the Examiner that it would be obvious to perform parallel multiplication as part of a decoding method in view of the serial multiplication used in the encoding method

described by Bottomley appears to be an attempt by the Examiner to reconstruct the claimed invention with the benefit of hindsight using the instant application as a template, which is inappropriate and cannot be the basis of a rejection under 35 U.S.C. 103.

Furthermore, as noted above, column 1, lines 25-34 of Bottomley does not teach or suggest a parallel code multiplying operation whatsoever, nor does it teach a "first parallel code multiplying operation" in combination with a "second parallel code multiplying operation", as claimed by the Applicant. The only basis which the Examiner has provided for the assertion that Bottomley teaches a decoding method that includes "a first parallel code multiplying operation" in combination with "a second parallel code multiplying operation" is the fact that Bottomley describes an encoding process that involves the serial multiplication of data symbols by a spreading sequence/codeword, which Applicant submits is entirely insufficient to render the claimed features obvious.

The Examiner concedes that Bottomley does not teach "determining an overall maximum of the second output symbols output of said second parallel code multiplying operations". Applicant agrees with the Examiner. Moreover, Applicant submits that Bottomley has little or nothing to do with the present Application. Furthermore, as noted above, the independent claims have been amended to clarify that the "overall maximum" is an "overall maximum second output symbol of the second output symbols produced by said second parallel code multiplying operation". Applicant submits that Bottomley fails to teach or even suggest determining an overall maximum second output symbol of the second output symbols output, as claimed.

In view of the Examiner's admitted difference between claim 1 of the present application and Bottomley, the Examiner looks to Falconer at column 6, lines 10-14 to contend that claim 1 of the present application is obvious. Applicant appreciates that this portion of Falconer teaches that "The predetermined size of the block of data symbols defined by the matrix is derived from the maximum number of data symbols which can be transmitted at a predetermined chip rate within a predetermined length transmission block" (emphasis added). However, the "size of the block of data symbols" represents the number of data symbols, which has nothing to do with determining an overall maximum second output symbol of the second output symbols produced by said second parallel code multiplying operation, as claimed by the Applicant. Furthermore,

the "matrix" that is referred to in the quoted portion of Falconer is an interleaving matrix that is used as part of the encoding and transmission process described in Falconer, which clearly has absolutely no relevance to the decoding method recited in claim 1.

In view of the foregoing, Applicant submits that the Examiner has not properly determined the differences between the claimed invention and the prior art. Therefore, the findings of fact as articulated by the Examiner are improper.

*Explanation to support an obviousness rejection*

As noted above, for the Patent Office to properly combine references in support of an obviousness rejection, the Patent Office must identify a reason why a person of ordinary skill in the art would have sought to combine the respective teachings of the applied references. The examination guidelines indicate that "The key to supporting any rejection under 35 U.S.C. 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious." The Court quoting In re Kahn, 441 F.3d 977, 988, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006), stated that '''[R]ejections on obviousness cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness.''' Applicant appreciates that the Examiner has articulated reasons why the claimed invention, as defined by the independent claims, would have been obvious. However, for reasons detailed below, the Examiner's articulated reasons cannot be regarded as being valid.

The Examiner has again stated that 'it would have been obvious for one of ordinary skill in the art at the time of the Applicant's invention to include, "determining an overall maximum of the second output symbols produced by said second parallel code multiplying operations," in the invention as disclosed by Bottomley et al. for the purposes of data rate control.' However, as noted above, Falconer does not teach "determining an overall maximum second output symbol of the second output symbols produced by said second parallel code multiplying operations". Furthermore, Applicant maintains that even if Falconer were to teach this feature, which Applicant does not concede, there is no apparent reason as to why the person skilled in the art would understand that combining this feature with Bottomley would facilitate data rate control.

Despite the fact that the portion of Falconer that the Examiner has relied on in rejecting claim 1 has absolutely nothing to do with "determining an overall maximum second output symbol", on the basis of this portion of Falconer the Examiner argues that "it is reasonable to expect one of ordinary skill in the art at the time of the applicant's invention to utilize maximums for managing limits for the purposes of smoothing performance of processing either in data rate or resource utilization, as is commonly known in the art". Applicant respectfully submits that there is no basis for this assertion and as such cannot support a rejection under 35 U.S.C. 103. The Examiner fails to provide any reasonable basis on which the completely unrelated aspect of deriving a predetermined size of a block of data symbols defined by an interleaving matrix from the maximum number of data symbols that can be transmitted at a predetermined chip rate within a predetermined length transmission block, as taught by Falconer with regard to the interleaving of encoded data symbols, could possibly be combined with the teachings of Bottomley (presumably in so far as Bottomley relates to decoding of encoded data symbols, despite the fact that the only portions of Bottomley that the Examiner has explicitly pointed to, namely column 1, lines 25-34, relate to encoding) "for the purposes of smoothing performance of processing either in data rate or resource utilization".

Furthermore, Applicant notes that even if the Patent Office is able to articulate and support a suggestion to combine the references, it is impermissible to pick and choose elements from the prior art while using the application as a template—see ***In re Fine***, 837 F.3d 1071 (Fed. Cir. 1988). It is respectfully submitted that incorporating the teachings of Falconer in relating to the size of the block of data symbols with the teachings of Bottomley is an attempt to arrive at claim 1 while using the present application as a template. This attempt is flawed because the Examiner's proposed modification does not account for the fact that neither Falconer nor Bottomley teach Applicant's claimed "first parallel code multiplying operation" in combination with a "second parallel code multiplying operation" and further in combination with "determining an overall maximum second output symbol of the second output symbols produced by said second parallel code multiplying operation".

If one were to use the present application as a template, which is nonetheless improper according to ***In re Fine***, one would have to first modify Bottomley so that it teaches Applicant's claimed

"first parallel code multiplying operation" together with Applicant's claimed "second parallel code multiplying operation". Also, one would have to modifying Falconer so that it teaches "determining an overall maximum second output symbol of the second output symbols produced by said second parallel code multiplying operation" as claimed by the Applicant. These numerous modifications cannot be regarded as obvious because the gap between the prior art and the claimed invention is too great. Applicant notes that the aforementioned examination guideline that issued on October 10, 2007 indicates that "the gap between the prior art and the claimed invention may not be 'so great' as to render the [claim] non-obvious to one reasonably skilled in the art." Therefore, the proposed combination of Bottomley and Falconer cannot render the present application obvious.

In view of the foregoing, Applicant submits that claim 1 of the present application is patentable over Bottomley and Falconer.

Independent claim 16

Applicant submits that independent claim 16 is patentable over Bottomley and Falconer for at least the same reasons provided above in respect of claim 1.

Dependent claims 9, 13, 14, 24, 27 and 28

Applicant submits that claims 9, 13, 14, 24, 27 and 28 are patentable over Bottomley and Falconer for at least the same reasons provided above in respect of the independent claim from which they depend.

Furthermore, Applicant respectfully submits that claims 9, 13, 14, 24, 27 and 28 recite features that further distinguish over Bottomley and Falconer.

With respect to claims 9 and 24, Applicant notes that claims 9 and 24 recite performing sequence de-repetition prior to said first parallel code multiplying operation. Applicant further notes that in support of the rejection of claims 9 and 24 the Examiner has pointed to column 3, lines 30-35 of Falconer, which states that "particular transmitted signals can be retrieved from the communications channel by despreading a signal representation of the sum of signals in the

communication channel with a user spreading code related to the particular transmitted signal which is to be retrieved from the communication channel". Applicant respectfully submits that the conventional despreading described in Falconer is entirely silent on the use of sequence de-repetition. The Examiner appears to be equating "despreading" with "sequence de-repetition", which is entirely inaccurate and inappropriate.

Accordingly, Applicant respectfully submits that the Examiner has failed to accurately determine the differences between claims 9 and 24 and the cited references.

With respect to claims 13, 14, 27 and 28, Applicant notes that claims 13 and 27 recite that the second parallel code multiplying operation is performed for at least 2 of the L codewords and claims 14 and 28 recite that the second parallel code multiplying operation is performed for all of the L codewords. Applicant further notes that the Examiner has again relied on column 1, lines 25-34 of Bottomley in support of the rejection of claims 13, 14, 27 and 28. Specifically, the Examiner has pointed to the fact that Bottomley indicates that in "direct spreading", each spread symbol is essentially the product of an information symbol and the spreading sequence and therefore "performing a process for any/all symbols/codewords would imply that this includes any finite subset as well". However, once again the Examiner has ignored the fact that the portions of Bottomley that have been relied upon and quoted by the Examiner relate to encoding and spreading, whereas the claims at issue relate to decoding. Applicant respectfully submits that there is no basis for the Examiner's conclusions that any of the teachings of Bottomley that relate to encoding and spreading are directly and obviously relevant to the process of decoding in the claimed manner.

Accordingly, Applicant respectfully submits that the Examiner has failed to accurately determine the differences between claims 13, 14, 27 and 28 and the cited references.

In view of the foregoing, the Examiner is respectfully requested to reconsider and withdrawn the rejections of claims 1, 9, 13, 14, 16, 24, 27 and 28 under 35 U.S.C. 103(a).

**Other Claim Rejections – 35 U.S.C. 103(a)**

The Examiner rejects claims 2, 4, 5, 8, 17, 19, 20, 23, 25 and 26 under 35 U.S.C. 103(a) as being unpatentable over Bottomley in view of Falconer and further in view of United States Patent No. 5,103,459 ("Gilhousen"). Applicant notes that the aforementioned claims depend on one or more claims for which their rejections should be withdrawn. Therefore, Applicant submits that the rejection of claims 2, 4, 5, 8, 17, 19, 20, 23, 25 and 26 should similarly be withdrawn. The Examiner is respectfully requested to reconsider and withdraw the rejection of claims 2, 4, 5, 8, 17, 19, 20, 23, 25 and 26 under 35 U.S.C. 103(a).

**Allowable Subject Matter**

Applicant thanks the Examiner for acknowledging that the subject matter of claims 3, 6, 7, 10-12, 15, 18, 21, 22 and 29 is considered allowable.

Favorable consideration is requested.

In the event that that the Examiner has concerns regarding the present response, the Examiner is encouraged to contact the undersigned at the telephone listed below.

Respectfully submitted,

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Encl.